

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

DEMOND MEEKS,

Plaintiff,

v.

THE CITY OF ROCHESTER, ALEXIS ORTIZ, TYLER
COUCH, "JOHN JOE POLICE OFFICERS 1-200" (names
and number of whom are unknown at present),

Defendants.

NOTICE OF REMOVAL

State No.: E2021010968

Case No.: 22-6163

Defendants The City of Rochester, Alexis Ortiz, and Tyler Couch, by their attorney Linda S. Kingsley, Corporation Counsel, and Spencer Ash, Esq., of Counsel, file this Notice of Removal to the United States District Court for the Western District of New York, pursuant to 28 U.S.C. § 1441, based on the following grounds:

1. On December 8, 2021, plaintiff electronically filed a Summons and Complaint in the Supreme Court of New York, Monroe County, which was assigned Index No. E2021010968. Copies of the Summons and Complaint are attached to the Index as Exhibit A.
2. Since that time, all defendants have been served with process.
3. Plaintiff's suit is brought pursuant to 42 U.S.C. § 1983, alleging that defendants have deprived plaintiff of his federal rights.
4. This Court has original jurisdiction over plaintiff's lawsuit.
5. Plaintiff's civil action was filed in the Supreme Court, Monroe County, which is within the District of this Court.
6. Written notice of the filing of this Notice of Removal will be provided to plaintiff, and a copy of this Notice will be filed in the appropriate State Court, as required by 28 U.S.C. § 1446(d).
7. Defendants demand a jury trial.

Wherefore, Defendants respectfully request that this action be removed from the

Supreme Court of the State of New York, Monroe County, to this Court for all further proceedings.

Dated: April 5, 2022
Rochester, New York

**LINDA KINGSLEY,
CORPORATION COUNSEL**

/s/ Spencer Ash

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